



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**FILED**

Order Instituting Rulemaking to Consider the Adoption of  
a General Order and Procedures to Implement the Digital  
Infrastructure and Video Competition Act of 2006.

11-01-06  
04:59 PM  
Rulemaking 06-10-005  
(Filed November 1, 2006)

**REPLY COMMENTS OF THE GREENLINING INSTITUTE ON RULEMAKING**

ROBERT GNAIZDA  
MARK RUTLEDGE  
The Greenlining Institute  
1918 University Avenue, Second Floor  
Berkeley, CA 94704  
Telephone: 510 926 4006  
Facsimile: 510 926 4010  
E-mail: robertg@greenlining.org

November 1, 2006

## BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider the Adoption of  
a General Order and Procedures to Implement the Digital  
Infrastructure and Video Competition Act of 2006.

Rulemaking 06-10-005  
(Filed November 1, 2006)

### REPLY COMMENTS OF THE GREENLINING INSTITUTE ON RULEMAKING

#### INTRODUCTION: California Rubber Stamp Commission?

The cable companies, joined surprisingly by Verizon and AT&T, wish to create a rubber stamp division of the CPUC. This rubber stamp for applications, combined with little or no information and the absence of public protests, was hardly what the California legislature envisioned in giving to its most respected state agency authority not only to create competition but to ensure that the underserved were effectively served. (See below, Cal. Public Util. Code Sec. 5810):

Increasing competition for video and broadband services is a matter of statewide concern for all of the following reasons (a)(1):

- Competition for video service should increase opportunities for programming that appeals to California's diverse population and many cultural communities.  
(a)(1)(D)

Legislation to develop this new process should adhere to the following principles (a)(2):

- Promote the widespread access to the most technologically advanced cable and video services to all California communities in a nondiscriminatory manner regardless of socioeconomic status. (a)(2)(B)
- Complement efforts to increase investment in broadband infrastructure and close the digital divide. (a)(2)(E)

As elaborated upon herein, the CPUC can help create a highly competitive video industry that lowers prices, increases the quality of services, and ensures that the underserved are not ignored without violating any free market principles. All that is necessary is:

- permit effective protests;
- require readily available comprehensive information in the application, as it affects the underserved; and
- leave in place key CPUC ingredients for effective participation such as intervener compensation.

Greenlining is prepared to demonstrate, if given sufficient time, that the legislative intent was not to create a rubber stamp PUC division or to bar the public from effective participation, as Verizon, AT&T and the cable industry wish to accomplish.

As many parties point out, including TURN and DRA, this proceeding is being unduly rushed to what could be a preordained judgment contrary to legislative intent. Whether or not such is accurate, the CPUC should not jeopardize its outstanding reputation for effective scrutiny and pro-consumer protections.

In Greenlining's view, it would be better for the CPUC to refuse jurisdiction over video than to soil its reputation as Verizon, AT&T and the cable companies propose.<sup>1</sup>

Due to the artificially constrained time limits for responses, Greenlining's responses will be addressed as they specifically apply to many of the major parties' comments. However, two broader comments are applicable.

First, as many parties have pointed out, this Commission was never given legislative authority to vary from its usual procedures relating to evidentiary hearings and written protests including at application and reapplication time. Greenlining's strong support for the legislation was premised on the CPUC exercising its high standards as they apply, for example, to the companies in telecommunications industry, such as Verizon and AT&T.

Second, it would be better to require no applications at all than to permit perfunctory applications as AT&T, Verizon and the cable industry request. As is commented on in Greenlining's AT&T section, this legislation passed only as a result of the commitments of AT&T and Verizon to very strong protection for underserved communities (see Section I).

---

<sup>1</sup> Greenlining has particular equity in raising this argument since it was one of the only groups that strongly opposed jurisdiction under the Department of Corporations and the strongest and perhaps most effective voice, in bringing jurisdiction to the CPUC.

## I. *AT&T Supports Rubber Stamp Commission*

AT&T seeks to turn the clock back on consumer protection. There is a surprising disparity between AT&T's position supporting this legislation and its legal response. AT&T helped rally a wide range of low-income and minority groups to support this legislation by demonstrating that it would specifically assist low-income and minority groups. Similarly, AT&T has had, at least in terms of the minority community, one of the strongest records in addressing their needs of any utility in the country.

Greenlining, therefore, hopes that AT&T will either withdraw its comments or substantially modify and clarify these comments within the next two weeks.

Greenlining objections to the opening comments of AT&T, which were filed by the AT&T services legal department, urge very limited data reporting (pp. 3-5, 8-9), a far too narrow investigatory and scrutiny role for the CPUC and DRA (pp. 9-11) and is silent on the intervener compensation system that has helped make them a progressive institution at least in addressing the concerns of the minority community. See, for example, AT&T's strong leadership on supplier diversity including technical assistance to small minority-owned businesses, its efforts to create diversity in the legal profession, its strong philanthropic commitment to underserved communities and its relatively good record in terms of top management diversity.

AT&T promoted AB 2987 to the minority community as providing strong oversight by the most respected state agency in California, the CPUC. It now states, contrary to specific provisions of AB 2987, that the Commission has limited enumerated authority over video services.

### *Little or No Reporting*

As Greenlining set forth in its opening comments, it believes that the OIR's proposed application process has inadequate reporting requirements, particularly as it affects the

underserved communities. AT&T argues for an even more limited reporting system: one that it did not dare advocate for when it sought to convince the minority and low-income communities to support its acquisition of the original AT&T (SBC/AT&T Merger) or when it sought support for AB2987.

AT&T demands an expeditious, streamlined and cost-effective application process and implicitly suggests that data on corporate responsibility and service to underserved community will interfere with the streamlined process. It will not do so since this data is readily available and much of it has already been submitted in other PUC proceedings. However, there is no necessity for the present timelines for filing an application. As DRA and TURN suggest, applications can be filed later in the year 2007 without harming the ability of AT&T or Verizon to effectively compete (*see* Cal. Public Util. Code Sec. 5840(g)).

If Greenlining were given sufficient time, it would offer a further critique of the weaknesses of AT&T's legal comments and how they could undermine the reputation of the CPUC, as well as being contrary to AT&T's previous and often laudatory leadership.

AT&T does not comment on intervener compensation. Greenlining therefore assumes that it supports the inclusion of intervener compensation in these and related proceedings.

## II. *Verizon: As Little Data As Possible*

Verizon, like AT&T, opposes effective reporting and scrutiny, two of the hallmarks of the CPUC's reputation. Like AT&T, Verizon has presented itself as a leader before the CPUC in its service to underserved communities and minorities and in significant part led to Greenlining Institute supporting its expedited merger with MCI. Verizon's comments, however, do not reflect, and in fact do a disservice to, the leadership it has previously displayed before the CPUC. Greenlining, therefore, urges Verizon to submit its comments to its CEO for further clarification.

As a demonstration of Verizon's desire not to have any form of scrutiny, it opens with strong opposition to intervenor compensation (p. 3). What Verizon desires is what it originally sought with the initial proposed legislation, non-scrutiny by an ineffective state agency that has little consumer respect or staff, such as the Department of Corporations (See Greenlining's opening comments on intervenor compensation).

A substantial part of Verizon's comments relate to data that it does not wish to provide that affects low-income, underserved, new immigrant and minority communities. However, there may be merit to some of Verizon's suggestions relating to some of the data it wishes to exclude. Given what appears to be the overriding purpose of its legalistic brief to report as little as possible, Greenlining needs more time to assess the implications of the data it wishes to exclude, such as the expected date of deployment by census block (pg. 11).

### III. CCTA: Free at Last

The CCTA and its members have been subject to a wide range of local scrutiny, some of it quite effective. Their comments apparently reflect their anticipation of an environment where there is far less scrutiny than they have faced before.

Based on Greenlining's analysis of their comments, combined with our analysis of the comments of Verizon and AT&T, Greenlining shares their belief that CPUC preemption of local authorities could be "freedom at last" from regulation and scrutiny.

CCTA contends, although there is no support in the legislation for this, that the nature of this Commission's authority is purely ministerial and even in a ministerial capacity, no burdens can or should be imposed. Greenlining has no doubt that if the CCTA secures its wishes, that the public and the legislature will regret its decision to give jurisdiction to a well respected authority.

As urged in prior sections, this Commission has a special obligation to the underserved, having been given preemptive authority. Equally important, this Commission has an outstanding reputation that it should preserve, not tarnish. An example of how far CCTA wishes this Commission to go in giving up its authority is its opposition to requiring a demonstration of good standing for renewal of an application. Apparently, according to CCTA, only the conviction of a RICO-type criminal act might be cause to delay a renewal application (p. 9).

Like AT&T and Verizon, CCTA opposes many of the clear reporting requirements of the legislation and/or of the OIR; particularly as they might impact underserved communities, the very communities needing the most protection (pp. 13-14). Apparently, any reporting that is done should be “confidential” to keep Greenlining Institute and Latino Issues Forum from determining if their rights are violated.

Not surprisingly, CCTA joins Verizon in opposing intervenor compensation (p. 12). Greenlining understands CCTA’s underlying motive. That is, the absence of intervenor compensation could eliminate any form of effective scrutiny. The need for intervenor compensation is especially important as it affects applications and renewals, since the local consumer protection connections that previously existed between the residents of the City of Walnut and its city council could be weakened. It is unlikely, for example, that this Commission will ever hear any effective complaints that can be followed through on by individual consumers, unlike the situation with the City of Walnut. Moreover, no aggregate group of consumers can replace a commissioner or the Commission if they are dissatisfied with the level of consumer protection.

It is for these reasons that Greenlining and other consumer groups may regret that local authority has been transferred to the CPUC and that the only form of competition may be

predatory competition in which the underserved are further excluded from broadband and a wide range of video and telecommunications services.

#### IV. *DRA's Proposals Are Essential*

DRA has raised issues that this Commission should especially heed. It was the presence of DRA that, in part, caused consumer groups to support CPUC jurisdiction.

DRA contends that this OIR restricts its right to play an effective, much less a major role in these proceedings (p. 2). Greenlining concurs, particularly given the short timelines and the desire of the video players to avoid public scrutiny, protests, and evidentiary hearings. It is, therefore, essential to give DRA a major role in these proceedings. This includes full and adequate staffing, which is why Greenlining advocated in its opening comments significant changes in the fee schedule to provide a budget of at least \$2 million. DRA correctly argues that this OIR will have the impact of eliminating effective consumer input and protests. For example, Greenlining believes that the GO should allow for protests to state video applications and provide a process for timely handling of such protests. Greenlining also believes that the order should require public notice of applications for state video franchisees. Lastly, Greenlining believes the order should allow local governments, DRA, interveners and members of the public to bring complaints to the CPUC relating to the franchise holder's failure to comply with statutory requirements.

Lastly, DRA discusses, albeit briefly, the need for evidentiary hearings (p. 7) Greenlining strongly supports this. A new era is beginning. Many unscrupulous potential franchise holders could apply for franchises. Examine, for example, this Commission's history with fly by night telecommunication providers who slammed and crammed and otherwise perpetuated fraud against underserved communities.



Greenlining, therefore, strongly supports:

- a.) the right of DRA to play a major role,
- b.) DRA's position on the importance of protests, and
- c.) DRA's emphasis on evidentiary hearings.

#### V. *TURN's Pro-Consumer Position*

Greenlining concurs with TURN's position that all interested parties should be permitted to protest initial applications and renewals (p. 4). In addition, Greenlining generally supports TURN's position that the Commission's apparent attempt to prohibit protests is an incorrect interpretation of AB2987 (pp. 3-6).

Greenlining concurs with TURN's position regarding intervenor compensation (pp. 6-8). Please see Greenlining's opening comments Section IV. Greenlining believes that no proceeding as important as this one should be without effective consumer participation.

In the absence of very specific legislation to the contrary, intervenor compensation must be an important part of all these proceedings. Greenlining did not advocate for CPUC jurisdiction in order be denied participation or to discover that protests to applications would be barred, or to encounter pro forma rubber stamp scrutiny of applications.

As set forth in the AT&T and Verizon sections, the absence of effective protests, including intervenor compensation, will in the long run substantially diminish the reputation of this Commission and the confidence the ratepayers presently have in it. The present five commissioners have worked hard to establish roles as leaders to protect the ratepayers. This should not be diminished by what occurs in this proceeding.

#### VI. *CCTPG/LIF Position Protects Consumers*

Greenlining fully affirms the comments of the California Community Technology Policy Group and Latino Issues Forum (CCTPG/LIF) that the CPUC must wholly fulfill its responsibilities as the “sole franchising authority” by (1) ensuring that a wide array of consumer perspectives are made available to the Commission and that all of California’s diverse video consumers are fully protected; (2) monitoring the build-out of advanced technologies and establishing a process for review of relative data; and (3) utilizing its role to promote diversity in the video services industry.

This Commission and some commenting parties propose the dissolution of intervenor compensation in this and related proceedings (OIR, pp. 6-7). CCTPG/LIF notes that “the Commission must encourage customer participation in video franchising regulation similarly to its other regulated utilities.” Greenlining fully agrees with this assertion. It is through the intervenor compensation system that organizations such as Greenlining and LIF are able to provide useful information and perspectives that are indicative of the impact of proposed Commission decisions and policies on low-income and minority communities. Without the intervenor compensation system in place, the Commission will not be privy to potential customer service shortcomings of franchise applicants, information that could determine whether a franchise should be approved or not by this Commission.

A primary and explicitly stated objective of AB 2987 is the widespread access and deployment of broadband and other advanced telecommunications technologies. This is highly important for California’s low and moderate income and minority communities, groups that are often at a disadvantage as to affordability, awareness, and physical access (based on build out of infrastructure) to new technologies that are rapidly becoming common tools for communicating and acquiring valuable information. As CCTPG/LIF point out in their comments, this Commission should fulfill this legislative mandate by encouraging outreach that makes

consumers aware of the full array of new technologies available and by developing a plan to ensure that service providers maximize build-out in a nondiscriminatory way (not targeting specific areas or seeking franchise areas based on socioeconomic makeup). This is an opportunity for this Commission and all new and incumbent video service providers to fulfill the legislative mandate to bridge the digital divide that still persists.

Finally, CCTPG/LIF encourages the Commission to “utilize its authority over video franchises to promote supplier and employment diversity (p. 11).” Greenlining fully agrees with this statement and, furthermore, believes that it would be in the best interests of consumers for the Commission to also encourage diversity in management and programming within the video service industry. Just as the Commission has been successful in the regulation of other utilities and in encouraging supplier diversity and increasing business opportunities for women, minorities and disabled veterans, it should be expected that the same success will occur in the regulation of the video services industry. As California enters into this new era of video services competition, it is imperative that this Commission ensure that all Californians have full access to not only the services provided and the newest technologies developed, but also to management positions and broadcast and programming leadership that strengthen respective communities and the state at-large.

## VII. *City of Walnut*

The City of Walnut has played a leadership position in protecting the public. Greenlining Institute strongly supports the City of Walnut’s positions relating to the filing of comments and the right to file protests (pp. 2-3). Greenlining believes local governments should be allowed to file comments regarding any state franchise that will affect that local government, just as we believe community groups should be able to file protests. The City of Walnut’s position is

particularly important given the desire of the potential video franchisees to curtail the scrutiny of the CPUC and the likelihood that at least initially CPUC staff will lack at least some relevant information that could protect the public.

Greenlining also supports the City of Walnut's position regarding a higher bond level and far higher initial fees (p. 6 and p.10). See Greenlining opening comments urging a robust CPUC staff funded by at least \$2 million in initial fees.

Relating to bond values of just \$100,000, it would be better for the CPUC to eliminate bonds than to suggest that a token amount can protect the public. If the CPUC will not set meaningful bond levels, then it should develop an alternative that includes far greater scrutiny than is presently sought of potential franchisees. This, of course, will require higher user fees. See also City of Pasadena support for a higher bond amount.

#### VIII. *League of California Cities Advances Important Consumer Interests*

The joint opening comments of the LOCC and the National Association of Telecomm raises two points in particular that Greenlining supports and are generally consistent with those filed by the City of Walnut.

First, Greenlining strongly supports the League's position supporting protests for applications, renewals, and transfers. Greenlining also supports the League's position that the \$100,000 cash bond is too low and the purpose and uses of such bonds are vague.

Second, Greenlining believes (particularly if the Commission fails to adopt the pro-consumer positions raised by DRA and TURN, as well as the many other pro-consumer positions) it must, as the League urges, amend its rules of practice and procedure to allow complaints to be filed by local governments.

Greenlining does not believe that the League or other local governments, based on past history, have sufficient resources to protect consumers. However, given the chronic understaffing of the CPUC combined with the OIR's specific limitations, including low fees and inadequate bonding amounts, as well as the exclusion of protests, it may be necessary to amend the rules of practice and procedure to allow for complaints by local governments.

The CPUC should not seek to prevent local government complaints unless it is prepared to do an outstanding job of protecting the public. The OIR in its present form does not induce such confidence. In particular, the underserved public must be specifically protected to a far greater degree than the OIR presently provides to avoid preemption of local government authority and input.

Community groups have the capacity to overturn local governments that do not protect them. The underserved community has no ability to throw out CPUC commissioners if they fail to protect them. For this reason alone, it is imperative that the CPUC, consistent with legislative intent, fully protect the needs of underserved communities as set forth herein in various sections and set forth in Greenlining's opening comments.

#### IX. County of Los Angeles and City of Oakland

Both entities, the County of Los Angeles and City of Oakland, contend that the CPUC's timeline, which is artificially constricted, and allows no protests, is not called for by the legislation and will put video customers at risk. Greenlining concurs. As set forth in other sections, Greenlining urges more realistic timelines that allow for a sufficient protest period.

X.      *Comments of SureWest and Caliveras et al.*

Caliveras and thirteen other small LECs have filed joint comments that seek to ensure that there can be no customer or consumer protests and that if there are any, that they will be entirely ineffectual. SureWest's lengthier comments essentially urge the same.

Both Caliveras and SureWest, for example, oppose protests and both oppose any mechanism by which consumers who make a major contribution can benefit from the present CPUC intervener compensation system.

As set forth in other sections, Greenlining totally disagrees and contends that protests and intervener compensation are key elements to ensure effective applications that meet the standards of the legislation and this OIR to protect the disadvantaged and the underserved.

SureWest also opposes full information in the application, prefers as little information as possible, and opposes the concept of the CPUC having any authority to order SureWest to gather all but the most elementary and perfunctory data. As set forth in other sections, Greenlining urges that SureWest's comments seeking the most minimal and useless application process should be disregarded.

Dated: November 1, 2006

Respectfully submitted,

/s/ Robert Gnaizda

Robert Gnaizda  
Mark Rutledge  
The Greenlining Institute

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF  
CALIFORNIA**

Order Instituting Rulemaking to Consider the Adoption of  
a General Order and Procedures to Implement the Digital  
Infrastructure and Video Competition Act of 2006.

Rulemaking  
(Filed November 1, 2006)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of:

**COMMENTS OF THE GREENLINING INSTITUTE ON DRAFT DECISION**

on all known parties to the above-captioned proceedings by mailing a properly addressed copy by first-class mail with postage prepaid, transmitting a facsimile copy, and/or transmitting an electronic copy to each party named in the official service list as maintained on the California Public Utilities Commission's web page.

Executed on October 25, 2006 at Berkeley, California.

/s/ Mark Rutledge

\_\_\_\_\_  
Mark Rutledge

# SERVICE LIST

## Appearance

WILLIAM H. WEBER  
ATTORNEY AT LAW  
CBeyond COMMUNICATIONS  
320 INTERSTATE NORTH PARKWAY  
ATLANTA, GA 30339

DAVID C. RODRIGUEZ  
STRATEGIC COUNSEL  
523 WEST SIXTH STREET, SUITE 1128  
LOS ANGELES, CA 90014

ESTHER NORTHRUP  
COX CALIFORNIA TELCOM, LLC  
5159 FEDERAL BLVD.  
SAN DIEGO, CA 92105

KIMBERLY M. KIRBY  
ATTORNEY AT LAW  
MEDIASPORTSCOM P.C.  
3 PARK PLAZA, SUITE 1650  
IRVINE, CA 92614

FASSIL FENIKILE  
AT&T CALIFORNIA  
525 MARKET STREET, ROOM 1925  
SAN FRANCISCO, CA 94105

SYREETA GIBBS  
AT&T CALIFORNIA  
525 MARKET STREET, 19TH FLOOR  
SAN FRANCISCO, CA 94105

ENRIQUE GALLARDO  
LATINO ISSUES FORUM  
160 PINE STREET, SUITE 700  
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER  
ATTORNEY AT LAW  
COOPER, WHITE & COOPER, LLP  
201 CALIFORNIA STREET, 17TH FLOOR  
SAN FRANCISCO, CA 94111

JOSEPH S. FABER  
ATTORNEY AT LAW  
LAW OFFICE OF JOSEPH S. FABER  
3527 MT. DIABLO BLVD., SUITE 287  
LAFAYETTE, CA 94549

DOUGLAS GARRETT  
COX COMMUNICATIONS  
2200 POWELL STREET, STE. 1035  
EMERYVILLE, CA 94608

GLENN SEMOW  
DIRECTOR STATE REGULATORY & LEGAL AFFAIR  
TELECOMMUNICATIONS  
CALIFORNIA CABLE & TELECOMMUNICATIONS  
360 22ND STREET, NO. 750  
OAKLAND, CA 94612

JEFFREY SINSHEIMER  
CALIFORNIA CABLE &  
360 22ND STREET, 750  
OAKLAND, CA 94612



LESLA LEHTONEN  
VP LEGAL & REGULATORY AFFAIRS  
CALIFORNIA CABLE TELEVISION ASSOCIATION  
ASSOCIATION  
360 22ND STREET, NO. 750  
OAKLAND, CA 94612

MARIA POLITZER  
LEGAL DEPARTMENT ASSOCIATE  
CALIFORNIA CABLE TELEVISION  
  
360 22ND STREET, NO. 750  
OAKLAND, CA 94612

MARK RUTLEDGE  
TELECOMMUNICATIONS FELLOW  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, SECOND FLR.  
BERKELEY, CA 94704

GREG R. GIERCZAK  
EXECUTIVE DIRECTOR  
SURE WEST TELEPHONE  
PO BOX 969  
200 VERNON STREET  
ROSEVILLE, CA 95678

## Information Only

KEVIN SAVILLE  
ASSOCIATE GENERAL COUNSEL  
FRONTIER COMMUNICATIONS  
2378 WILSHIRE BLVD.  
MOUND, MN 55364

ANN JOHNSON  
VERIZON  
HQE02F61  
600 HIDDEN RIDGE  
IRVING, TX 75038

ALOA STEVENS  
DIRECTOR, GOVERNMENT&EXTERNAL AFFAIRS  
POLICY  
FRONTIER COMMUNICATIONS  
PO BOX 708970  
SANDY, UT 84070-8970

RICHARD CHABRAN  
CALIFORNIA COMMUNITY TECHNOLOGY  
  
1000 ALAMEDA STREET, SUITE 240  
LOS ANGELES, CA 90012

GREG FUENTES  
11041 SANTA MONICA BLVD., NO.629  
LOS ANGELES, CA 90025

JONATHAN L. KRAMER  
ATTORNEY AT LAW  
KRAMER TELECOM LAW FIRM  
2001 S. BARRINGTON AVE., SUITE 306  
LOS ANGELES, CA 90025

MICHAEL J. FRIEDMAN  
VICE PRESIDENT  
TELECOMMUNICATIONS MANAGEMENT CORP.  
5757 WILSHIRE BLVD., SUITE 645  
LOS ANGELES, CA 90036

BARRY FRASER  
CABLE FRANCHISE ADMINISTRATOR  
COUNTY OF SAN DIEGO  
1600 PACIFIC HIGHWAY, ROOM 208  
SAN DIEGO, CA 92101

STEVEN LASTOMIRSKY  
DEPUTY CITY ATTORNEY  
CITY OF SAN DIEGO

AARON C. HARP  
OFFICE OF THE CITY ATTORNEY  
CITY OF NEWPORT BEACH

1200 THIRD AVENUE, 11TH FLOOR  
SAN DIEGO, CA 92101

3300 NEWPORT BLVD  
NEWPORT BEACH, CA 92658-8915

BILL NUSBAUM  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

CHRISTINE MAILLOUX  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

ELAINE M. DUNCAN  
ATTORNEY AT LAW  
VERIZON  
711 VAN NESS AVENUE, SUITE 300  
SAN FRANCISCO, CA 94102

REGINA COSTA  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

WILLIAM K. SANDERS  
DEPUTY CITY ATTORNEY  
OFFICE OF THE CITY ATTORNEY  
1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO, CA 94102-4682

PETER A. CASCIATO  
A PROFESSIONAL CORPORATION  
355 BRYANT STREET, SUITE 410  
SAN FRANCISCO, CA 94107

NOEL GIELEGHEM  
COOPER, WHITE & COOPER LLP  
201 CALIFORNIA ST. 17TH FLOOR  
SAN FRANCISCO, CA 94111

JOSE E. GUZMAN, JR.  
NOSSAMAN GUTHNER KNOX & ELLIOTT LLP  
50 CALIFORNIA STREET, 34TH FLOOR  
SAN FRANCISCO, CA 94111-4799

GRANT KOLLING  
SENIOR ASSISTANT CITY ATTORNEY  
CITY OF PALO ALTO  
(CFC)  
250 HAMILTON AVENUE, 8TH FLOOR  
PALO ALTO, CA 94301

ALEXIS K. WODTKE  
ATTORNEY AT LAW  
CONSUMER FEDERATION OF CALIFORNIA  
  
520 S. EL CAMINO REAL, STE. 340  
SAN MATEO, CA 94402

MARK T. BOEHME  
ASSISTANT CITY ATTORNEY  
CITY OF CONCORD  
1950 PARKSIDE DRIVE  
CONCORD, CA 94510

PETER DRAGOVICH  
ASSISTANT TO THE CITY MANAGER  
CITY OF CONCORD  
1950 PARKSIDE DRIVE, MS 01/A  
CONCORD, CA 94519

CHRIS VAETH  
ATTORNEY AT LAW  
THE GREENLINING INSTITUTE

ROBERT GNAIZDA  
POLICY DIRECTOR/GENERAL COUNSEL  
THE GREENLINING INSTITUTE

1918 UNIVERSITY AVE., 2ND FLOOR  
FLOOR  
BERKELEY, CA 94704

1918 UNIVERSITY AVENUE, SECOND  
BERKELEY, CA 94704

BARRY F. MCCARTHY, ESQ.  
ATTORNEY AT LAW  
AFFAIRS  
MCCARTHY & BARRY LLP  
CALIFORNIA  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113

CHARLES BORN  
MANAGER, GOVERNMENT & EXTERNAL  
FRONTIER COMMUNICATIONS OF  
9260 E. STOCKTON BLVD.  
ELK GROVE, CA 95624

JOE CHICOINE  
MANAGER, STATE GOVERNMENT AFFAIRS  
FRONTIER COMMUNICATIONS  
PO BOX 340  
ELK GROVE, CA 95759

SUE BUSKE  
THE BUSKE GROUP  
3001 J STREET, SUITE 201  
SACRAMENTO, CA 95816

## State Service

ANNE NEVILLE  
CALIF PUBLIC UTILITIES COMMISSION  
CARRIER BRANCH  
ISSUES BRA  
AREA 3-E  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOSEPH WANZALA  
CALIF PUBLIC UTILITIES COMMISSION  
TELECOMMUNICATIONS & CONSUMER  
ROOM 4101  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MICHAEL OCHOA  
CALIF PUBLIC UTILITIES COMMISSION  
TELECOMMUNICATIONS & CONSUMER ISSUES BRA  
ISSUES BRA  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ROBERT LEHMAN  
CALIF PUBLIC UTILITIES COMMISSION  
TELECOMMUNICATIONS & CONSUMER  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4300  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

TIMOTHY J. SULLIVAN  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5204  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

WILLIAM JOHNSTON  
CALIF PUBLIC UTILITIES COMMISSION  
TELECOMMUNICATIONS & CONSUMER ISSUES BRA

DELANEY HUNTER  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION

ROOM 4101  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814